

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC, and Bernard L. Madoff,

Plaintiff,

v.

FULLERTON CAPITAL PTE LTD.,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 12-01004 (SMB)

**STIPULATION EXTENDING TIME TO RESPOND
AND ADJOURNING THE PRE-TRIAL CONFERENCE**

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.*, and the estate of Bernard L. Madoff, individually, by and through his counsel, Baker & Hostetler LLP, and defendant Fullerton Capital PTE Ltd. (“Fullerton”), by and through its counsel, Arnold & Porter LLP, hereby stipulate and agree as follows:

WHEREAS on January 5, 2012, the Trustee filed a complaint in the above-captioned adversary proceeding against Fullerton in this Bankruptcy Court (the “Court”), asserting bankruptcy law claims (the “Complaint”);

WHEREAS on April 2, 2012, Fullerton filed a motion to dismiss the Complaint in this action;

WHEREAS the parties to this stipulation reserve all rights and defenses the Trustee and Fullerton may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction;

IT IS HEREBY STIPULATED AND AGREED by and between the Trustee and Fullerton, by the endorsement of their counsel below, that:

1. The Trustee shall respond to Fullerton’s motion to dismiss the Complaint no later than January 15, 2015;
2. Fullerton’s reply to the Trustee’s response shall be filed and served no later than February 26, 2015; and
3. The Pre-Trial Conference shall be adjourned from February 25, 2015, to May 29, 2015, at 10:00 a.m.

This stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile or electronic copy of this stipulation shall be deemed an original. This stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 7037).

Dated: October 27, 2014
New York, New York

By: /s/ Thomas L. Long
BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Thomas L. Long
Email: tlong@bakerlaw.com
Regina L. Griffin
Email: rgriffin@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the Estate of Bernard L. Madoff*

By: /s/ Mary E. Sylvester
ARNOLD & PORTER LLP
399 Park Avenue
New York, New York 10022
Telephone: (212) 715-1000
Facsimile: (212) 715-1399
Pamela A. Miller
Email: Pamela.Miller@aporter.com
Kent A. Yalowitz
Email: Kent.Yalowitz@aporter.com
Mary E. Sylvester
Email: Mary.Sylvester@aporter.com

Attorneys for Defendant Fullerton Capital PTE Ltd.